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Denise Colombo

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS,  
INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-13555 (SCC)

(Jointly Administered)

**DECLARATION OF ELIZABETH BERKE-DREYFUSS IN SUPPORT OF  
CLAIMANTS' SYLVIA VEGA-SUTFIN, MICHELLE SEYMOUR,  
CHERYL MCNEIL, LINDA HOWARD-JAMES, ISABEL GUAJARDO  
AND DENISE COLOMBO REPLY BRIEF IN SUPPORT OF MOTION FOR  
RELIEF FROM STAY AND INJUNCTION PROVIDED UNDER PLAN**

I, Elizabeth Berke-Dreyfus, declare as follows:

1. I am over the age of eighteen, and if called as a witness, could testify competently as to the contents of this Declaration, except as to those matter that are alleged upon information and belief, and as to those matters, I belief them to be true. I am a partner with Wendel, Rosen, Black & Dean LLP, bankruptcy counsel for Claimants, Coleen Colombo, Isabel Guajardo, Linda (Weeks) Howard-James, Cheryl McNeil, Michelle Seymour and Sylvia Vega-Sutfin (collectively, "Claimants"). I make this Declaration in support of Claimants' Reply Brief in Support of Claimant's Motion for Relief from Stay.

2. On September 22, 2012, I had a telephone conversation with Ms. Candace Arthur, one of BNC's counsel at Weil Gotshal & Manges LLP. As part of that conversation, I asked Ms. Arthur the status of the insurance coverage issue, since the last hearing date on Claimants' Motion, which was continued to provide BNC with an opportunity to review its insurance policy and place its insurer on notice. See, Letter of Jacqueline Marcus, ECF Doc. No. 46161. In our telephone conversation, Ms. Arthur advised me that the insurance company requested that BNC oppose the Claimants' Motion.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 3rd day of October, 2014, at Oakland, California.

/s/ Elizabeth Berke-Dreyfuss  
Elizabeth Berke-Dreyfuss